



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ADR/AS
F. #2024R00396

*271 Cadman Plaza East
Brooklyn, New York 11201*

August 12, 2024

By Email and ECF

Samuel Jacobson, Esq.
Federal Defenders of New York
One Pierrepont Plaza, 16th Floor
Brooklyn, NY 11201

Re: United States v. Halima Salman
Criminal Docket No. 24-206 (NCM)

Dear Counsel:

Enclosed please find additional discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which is being produced subject to the Stipulation and Protective Order agreed to by the parties and ordered by the Court on June 3, 2024. The government also requests reciprocal discovery from the defendant.

- Reports of interviews of the defendant's family and attachments, including signed Advice of Rights forms, bates-numbered HSALMAN_000074 – HSALMAN_000550.
- Photographs of the interview rooms and nearby area in Syria, bates-numbered HSALMAN_000551 – HSALMAN_000567. Photographs of the interview room where the defendant's interview took place are bates-numbered HSALMAN_000551 – HSALMAN_000556.
- Materials provided by Workpail, bates-numbered HSALMAN_000568.
- A forensic extraction from a second cellular device telephone assessed to belong to the defendant's husband, which will be produced on a separate drive and bates-numbered HSALMAN_000569. This material is designated SENSITIVE DISCOVERY MATERIAL under the June 3, 2024 Stipulation and Protective Order.

You may examine physical evidence discoverable under Rule 16, including original documents, by calling me to arrange a mutually convenient time.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Amanda Shami
Andrew D. Reich
Amanda Shami
Assistant U.S. Attorneys
(718) 254-7000

Enclosures

cc: Clerk of the Court (NCM) (by ECF) (without enclosures)